

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY)
AVERAGE WHOLESALE PRICE)
LITIGATION)

MDL NO. 1456
Civil Action No. 01-12257-PBS

THIS DOCUMENT RELATES TO:)

Hon. Patti B. Saris

ALL ACTIONS)
_____))
_____)

**DECLARATION OF WAYNE A. CROSS IN SUPPORT OF APPLICATION FOR
ADMISSION PRO HAC VICE**

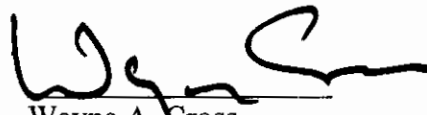
Wayne A. Cross, an attorney with the firm of White & Case LLP, 1155 Avenue of the Americas, New York, NY 10036, hereby declares:

1. I am a member in good standing of the State Bar of New York.
2. I have been admitted to practice in the United States District Court for the Eastern District of New York, United States District Court for the Southern District of New York, United States District Court for the Western District of New York, United States Court of Appeals for the Federal Circuit, United States Court of Appeals for the First Circuit, United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Third Circuit, United States Court of Appeals for the Fifth Circuit, United States Court of Appeals for the Seventh Circuit, United States Court of Appeals for the Ninth Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Eleventh Circuit and the United States Supreme Court.
3. I am a member in good standing in the courts listed above.

4. I am not suspended or disbarred in any court and have never been the subject of a professional disciplinary proceeding.
5. Attached hereto as Exhibit 1 is a Certificate of Good Standing of the Bar of the United States District Court of the Southern District Court of New York of which I am a member.
6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty or perjury that the foregoing is true and correct.

Dated: New York, New York
September 22, 2005.


Wayne A. Cross